REMARKS/ARGUMENTS

Reconsideration and allowance of the present application based on the following remarks are respectfully requested. Claim 19 has been amended. Support for the amendment may be found throughout the specification, for example at pages 1-2 of the specification. No new matter has been added. Claim 19 is independent. Upon entry of the above amendments, claims 19 and 21-29, as amended, will be pending.

Claims 19 and 21-29 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over EP 0688854. The amendment to the claims is believed to address these rejections. Specifically, EP0688854 does not suggest a metal working fluid having the composition of the claims wherein n is 1.5 to 10 as illustrated below.

The relevant portions of the EP0688854 and the present invention appear as follows:

EP0688854:

-OCOCH₂(CH₂)_{n1}-CH₂COOCH₂-

Present Invention: -(OCO-Z-COO-Y)_n-

Therefore, even when n1 = 0.5 (the range disclosed in the reference), EP0688854 does not suggest the compounds of the metal working fluid of the instant claims wherein n=1.5 to 10.

Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection. Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Application No. 10/006,368 Amendment dated August 23, 2005 Page 5

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

MAYER BROWN ROWE & MAW LLP

Registration No. 54,579 Direct No. (202) 263-3255

Paul L. Sharer Registration No. 36,004 Direct No. (202) 263-3340

PLS/JEM Intellectual Property Group 1909 K Street, N.W. Washington, D.C. 20006-1101 (202) 263-3000 Telephone (202) 263-3300 Facsimile